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7 Attorneys for GOOGLE LLC

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendants.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559

**DECLARATION OF NIMA HEFAZI IN  
SUPPORT OF GOOGLE LLC'S  
OPPOSITION TO SONOS, INC.'S  
MOTION FOR LEAVE TO AMEND  
INFRINGEMENT CONTENTIONS  
PURSUANT TO PATENT L.R. 3-6**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLC  
4 representing Google LLC (“Google”) in this matter. I make this declaration in support of  
5 Google’s Opposition to Sonos, Inc.’s (“Sonos”) Motion for Leave to File Amended Infringement  
6 Contentions Pursuant to Patent L.R. 3-6 (“Motion”). If called as a witness, I could and would  
7 testify competently to the information contained herein.

8 2. On December 11, 2020, Sonos served its preliminary infringement contentions in  
9 accordance with Judge Albright’s Order Governing Proceedings when the action was still pending  
10 in the Western District of Texas.

11 3. On January 8, 2021, Sonos served its first supplemental preliminary infringement  
12 contentions on January 8, 2021.

13 4. On March 5, 2021, Google produced its technical documentation and source code  
14 for the accused products.

15 5. Thereafter, Sonos served second supplemental preliminary infringement  
16 contentions on June 5, 2021, third supplemental infringement contentions on July 14, 2021, and  
17 “final” infringement contentions on September 10, 2021.

18 6. The action was transferred to the Northern District of California on September 27,  
19 2021. On October 21, 2021, Sonos served another set of infringement contentions pursuant to the  
20 district’s Patent Local Rule 3-1.

21 7. Google and Sonos exchanged proposed terms for construction in compliance with  
22 Patent Local Rule 4-1 on December 20, 2021.

23 8. Pursuant to Patent Local Rule 4-2, Google and Sonos simultaneously exchanged  
24 their respective proposed preliminary constructions for these selected claim terms on January 10,  
25 2022.

26 9. On January 20, 2022, Sonos served another set of supplemental infringement  
27 contentions pursuant to the Court’s order following Google’s letter for discovery relief. Sonos’s  
28

1 supplemental contentions did not include its new proposed theories for the “resource locators” and  
2 “local playback queue” terms.

3 10. Attached as Exhibit 1 is a true and correct copy of an excerpt of Sonos’s  
4 Preliminary Damages Disclosures Pursuant to Patent Local Rule 3-8.

5 11. Attached as Exhibit 2 is a true and correct copy of an excerpt of a transcript for the  
6 January 6, 2021 hearing.

7 12. Attached as Exhibit 3 is a true and correct copy of a February 4, 2022 email from  
8 Sonos’s counsel to Google’s counsel.

9 13. Attached as Exhibit 4 is a true and correct copy of an excerpt of Sonos’s Expert  
10 Report of Douglas C. Schmidt on Claim Construction.

11 14. Attached as Exhibit 5 is a true and correct copy of an excerpt of Sonos’s Patent  
12 L.R. 4-2 Preliminary Claim Constructions and Identification of Evidence.

13 15. Attached as Exhibit 6 is a true and correct copy of an excerpt of Exhibit A to  
14 Sonos’s October 21, 2021 Disclosure of Asserted Claims and Infringement Contentions,  
15 comprising of an Infringement Contention Chart for U.S. Patent No. 9,967,615.

16  
17 I declare under penalty of perjury that to the best of my knowledge the foregoing is true  
18 and correct. Executed on February 22, 2022, in Los Angeles, California.

19 DATED: February 22, 2022

20 By: /s/ Nima Hefazi

21 Nima Hefazi  
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**ATTESTATION**

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

/s/ Charles K. Verhoeven

Charles K. Verhoeven